

Sarah E. Piepmeier, Bar No. 227094
SPiepmeier@perkinscoie.com
Elise Edlin, Bar No. 293756
EEdlin@perkinscoie.com
PERKINS COIE LLP
505 Howard Street, Suite 1000
San Francisco, California 94105
Telephone: +1.415.344.7000
Facsimile: +1.415.344.7050

Janice L. Ta (admitted *pro hac vice*)
JTa@perkinscoie.com
PERKINS COIE LLP
405 Colorado Street Suite 1700
Austin, Texas 78701
Telephone: +1.737.256.6100
Facsimile: +1.737.256.6300

Jassiem N. Moore, (admitted *pro hac vice*)
JassiemMoore@perkinscoie.com
PERKINS COIE LLP
1201 Third Avenue, Suite 4900
Seattle, Washington 98101-3099
Telephone: +1.206.359.8000
Facsimile: +1.206.359.9000

Brianna Kadjo, Bar No. 303336
BKadjo@perkinscoie.com
PERKINS COIE LLP
1900 Sixteenth Street, Suite 1400
Denver, Colorado 80202-5255
Telephone: +1.303.291.2300
Facsimile: +1.303.291.2400

Attorneys for Defendant NETFLIX, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

LAURI VALJAKKA,

Plaintiff,

v.

NETFLIX, INC.,

Defendant.

Case No. 4:22-cv-01490-JST

~~PROPOSED~~ STIPULATION AMENDING
PROTECTIVE ORDER

1 WHEREAS, by stipulation of the parties, a protective order issued in this action on July 25,
2 2022 (the “Protective Order”);

3 NOW, THEREFORE, Plaintiff and Defendant hereby agree and stipulate to the amendment
4 of the Protective Order issued in this action on July 25, 2022, as follows:

5 The following documents are designated “HIGHLY CONFIDENTIAL – ATTORNEYS’
6 EYES ONLY,” however for the purpose of transparency under Rule 408, Valjakka allows Netflix
7 In-House Counsel to view these documents:

8 LV003942;

9 LV004030;

10 LV004038;

11 LV004058;

12 LV004070;

13 LV2_000410;

14 LV2_000799;

15 LV2_002242

16 LV2_002712;

17 LV2_003057;

18 LV2_003282;

19 LV2_003450;

20 LV2_004315;

21 NFX-VALJ-00011043;

22 NFX-VALJ-00011048.

23 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

24 DATED July 27, 2023

/s/ William P. Ramey, III.

William P. Ramey, III (appearance *pro hac vice*)

wramey@rameyfirm.com

RAMEY LLP

5020 Montrose Blvd., Suite 800

Houston, Texas 77006

Telephone: +1.713.426.3923

United States District Court
Northern District of California

Facsimile: +1.832.689.9175

Susan S.Q. Kalra, Bar No. 167940
susan@m-iplaw.com
RAMEY LLP
303 Twin Dolphin Drive, Suite 600
Redwood City, California 94065
Telephone: +1.408.236.6640
Facsimile: +1.408.236.6641

Attorneys for Plaintiff LAURI VALJAKKA

DATED: July 27, 2023

/s/ Sarah E. Piepmeier
Sarah E. Piepmeier, Bar No. 227094
SPiepmeier@perkinscoie.com
Elise Edlin, Bar No. 293756
EEdlin@perkinscoie.com
PERKINS COIE LLP
505 Howard Street, Suite 1000
San Francisco, California 94105
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Telephone: +1.206.359.8000
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PERKINS COIE LLP
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Denver, Colorado 80202-5255
Telephone: +1.303.291.2300
Facsimile: +1.303.291.2400

Attorneys for Defendant NETFLIX, INC.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: July 27, 2023


Hon. Jon S. Tigar
United States District Judge

United States District Court
Northern District of California